

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

John & Jane Doe,

Plaintiffs;

v.

Case No.

St. Paul's School, et al.

Defendants.

**[PROPOSED] PROTECTIVE ORDER GRANTING PLAINTIFFS' MOTION
SEEKING A PROTECTIVE ORDER SEALING EXHIBIT A**

Whereas, Plaintiffs, John Doe and Jane Doe, as parents, next friends, and legal guardians to their minor daughter J.D, have filed a Motion Seeking a Protective Order Exhibit (the "Motion");

Whereas, in the Motion, Plaintiffs have "explained the basis for sealing" in accordance with L.R. 83.12(c);

Whereas, in the Motion, Plaintiffs have "specified the proposed date on which the requested seal order shall expire" in accordance with L.R. 83.12(c);

Whereas, in the Motion, Plaintiffs have "designated whether the material is to be sealed at Level I or Level II" in accordance with L.R. 83.12(c);

Whereas, Plaintiffs have identified the following portion of the record as that portion which is subject to the Motion: Exhibit A to Plaintiffs' Memorandum in Support of their Motion for Leave to Proceed Under Pseudonyms and thereof (the "Sealed Record");

Whereas the Court has considered the Motion and any opposition thereto;

Whereas the Court has not ruled on the Motion for at least fourteen (14) days after it was entered on the public Court docket to permit the filing of objections by interested parties;

Whereas, the Court has considered any objections by interested parties;

Whereas the Plaintiffs have stated in the Motion why alternatives to sealing would not provide sufficient protection;

Whereas the Court finds and holds that sealing of a portion and/or portions of the record, specified herein, is appropriate;

Accordingly, it is this ____ day of _____, by the United States District Court for the District of New Hampshire, hereby ORDERED:

1. That Plaintiffs' Motion Seeking a Protective Order Sealing Portions of the Court Record be, and the same hereby is, GRANTED, as specifically set forth herein;

2. That the Sealed Record (as defined above) be, and hereby is, PLACED UNDER SEAL by the Clerk of the Court and that the Sealed Record shall be placed in an envelope or other container which is marked SEALED SUBJECT TO ORDER OF COURT DATED _____.

3. A copy of this Order shall be mailed to all counsel of record and to any other person entitled to notice hereof, and shall be docketed in the Court file.

United States District Judge
United States District Court for the
District of New Hampshire